

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA

\_\_\_\_\_  
FELIPE DE JESUS AVILA-SOTO,  
FELIPE DE JESUS SUAREZ-PALAFOX,  
and JUAN ALEJO HERNANDEZ-CANELA,  
ON BEHALF OF THEMSELVES AND  
ALL OTHERS SIMILARLY SITUATED,

Plaintiffs,

v.

SOUTH CENTRAL SUGAR CANE  
GROWERS' ASSOCIATION, INC., AND  
STERLING SUGARS, LLC,

Defendants.  
\_\_\_\_\_

Case No. 6:24-cv-01392

DECLARATION OF DAWSON MORTON

1. I am counsel for Plaintiffs in this action. I have personal knowledge of the matters stated herein and if called to testify I could competently testify to the matters stated below.
2. I speak English and Spanish and have been an attorney for over twenty-five years. I am licensed to practice in Georgia and California.
3. To attend the deposition of Plaintiff Felipe Avila-Soto in Torreon, Mexico, I flew from San Francisco, California. The trip requires a connecting flight in Houston and takes in total approximately 9 hours each way.
4. The cost of roundtrip travel, hotel stay, and ground transportation to attend the deposition in Mexico totaled approximately \$2,000 with airfare being the largest cost.
5. Mr. Avila-Soto works as an over-the-road truck driver for a company called Somos Fletes and frequently travels large distances within Mexico and is away from home overnight.
6. Mr. Avila-Soto is not wealthy and makes a base wage which is approximately \$250 U.S. dollars per week.

7. Mr. Avila-Soto turned down work to attend his deposition and had an additional work assignment following the day of his deposition and was not able to stay for another day of deposition.
8. After the interpreter hired by the Defendants left the deposition, Mr. Avila-Soto and I waited for approximately two hours along with defense counsel and the court reporter for another interpreter to be obtained.
9. While we were waiting I tried to assist Defendants in locating another interpreter by emailing a federal-court certified interpreter, Catherine McCabe, to inquire if she was available on short notice, but she was in a deposition herself.
10. My return travel international flight from Mexico was ticketed for a 6:12 a.m. departure the day following the deposition of Mr. Avila-Soto.
11. Juan Alejo Hernandez-Canela worked as an H-2A truck driver for the Defendants this 2025 sugar cane season. However, he experienced a health issue and left for Mexico in mid-November of 2025. He resides in the southern part of the state of Veracruz, Mexico which is where he returned for medical treatment.
12. Pursuant to 28 U.S.C. § 1746 and under penalty of perjury, I declare that the foregoing facts are true and correct to the best of my knowledge.

Executed on January 22, 2026.

\_\_\_\_s/ D. Morton\_\_\_\_\_  
Dawson Morton